



U.S. Department of Justice

United States Attorney  
Eastern District of New York

SK  
F.#2013R00948

610 Federal Plaza  
Central Islip, New York 11722

February 12, 2016

By ECF

The Honorable Joseph F. Bianco  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ FEB 17 2016 ★

LONG ISLAND OFFICE

Re: United States v. Philip Kenner and Tommy Constantine  
Criminal Docket No. 13-607 (S-2) (JFB)

Dear Judge Bianco:

The government respectfully submits this letter to request a brief extension of time to respond to the defendant's post-trial motions. The government is diligently preparing its response but requests additional time due to the length of the record in this case and the nature of the defendant's claims. The government has conferred with defense counsel for both parties and the Court's deputy; defense counsel consent in this request and the parties jointly propose the following schedule: February 26, 2016 as the due date for the government's response; March 11, 2016 as the due date for the defendants' reply; and March 30, 2016 at 2:00pm for any oral argument on the motion.

*Request granted.*

Respectfully submitted,

ROBERT L. CAPERS  
United States Attorney

By: /s/  
Saritha Komatireddy  
Assistant U.S. Attorneys  
(718) 254-6054

cc: All counsel of record (by ECF)

*s/ Joseph F. Bianco*  
*AND*  
*Feb. 17 2016*  
*U.S. DISTRICT COURT, N.Y.*